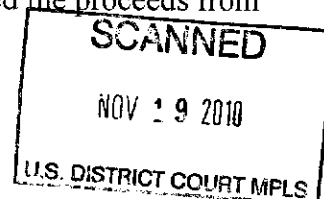


UNITED STATES DISTRICT COURT
for the
DISTRICT OF MINNESOTA

Madison Financial Companies, Inc.,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No.
Robert Mohan Tiwari, United States of)	
America, and Wells Fargo Bank, N.A.,)	
)	
Defendants)	

**COMPLAINT FOR INTERPLEADER
AND DECLARATORY RELIEF**

1. **Statement of Jurisdiction.** This action arises under 28 U.S.C. Section 1335. Upon information and belief Wells Fargo Bank, N.A. and defendant Robert Mohan Tiwari are residents of different states. The United States of America has consented to be sued in this type of proceeding pursuant to 28 U.S.C Section 2410. This matter arises under Federal Rule of Civil Procedure 22.
2. On November 15, 2010, the plaintiff, a company incorporated in the State of Minnesota and operating a business of cashing checks, received three cashier's checks (hereinafter collectively referred to as the "Checks") in the aggregate amount of \$90,000 issued by Wells Fargo Bank, N.A. with Robert Mohan Tiwari as the named payee. A Copy of the Checks is attached as Exhibit A.
3. As a condition for cashing the Checks plaintiff made inquiries of Wells Fargo Bank, N.A. as to whether the Checks were valid and negotiable.
4. Representatives of two branches of Wells Fargo Bank, N.A. both assured plaintiff that the Checks were valid and negotiable.
5. Relying upon the advice of Wells Fargo representatives plaintiff did, on November 15, 2010, cash the Checks.
6. Defendant Robert Mohan Tiwari claims to be the rightful owner of the proceeds of the Checks and has asserted a claim to be paid the full amount of the proceeds of the Checks, less plaintiff's normal check cashing fees..
7. On November 18, 2010 plaintiff was advised that the United States of America claims to be the rightful owner of the proceeds of the Checks and has demanded the proceeds from



plaintiff.

8. Upon information and belief, Wells Fargo Bank, N.A. may hold and assert claims to the proceeds of the Checks.

9. Based upon the multiple claims of right to the proceeds of the Checks plaintiff is in doubt about who should be paid and faces multiple liability if payment is made to one party defendant and not another.

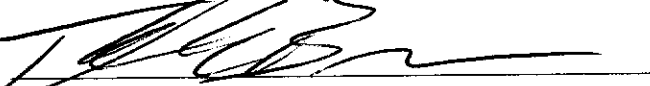
9. Plaintiff has simultaneously with the filing of this case deposited all of the proceeds of the Checks with the Registry of Court.

Therefore, the plaintiff demands that:

- (a) each defendant be restrained from commencing any action against the plaintiff on the proceeds of the Checks;
- (b) a judgment be entered that no defendant is entitled to the proceeds of the Checks or any part of it, or that the defendants be required to interplead and settle among themselves their rights to the proceeds of the Checks and recover the same from the Registry of Court, and that the plaintiff be discharged from all liability; and
- (c) the plaintiff recover its costs.

Date: November 19, 2010

Madison Financial Companies, Inc.



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